

HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

CONTINENTAL CASUALTY COMPANY

Plaintiff,

v.

ROSALINDA HERRERA HEREDIA,  
individually and as parent and guardian of  
A.R.H., a minor; JUAN REYES TAPIA;  
LESLIE REYES-HERRERA; ANA HERRERA  
HEREDIA, individually and as parent and  
guardian of E.H., a minor; EDUARDO  
HERNANDEZ HERRERA; SAMPSON  
KWAKU GYAN and GEORGINA  
TWUMWAA GYAN, both individually and as  
parents and guardians of M.G., a minor;  
AMANDA POMAA GYAN; FRANCIS  
KWADWO GYAN; ANGELINA ADOMA  
GYAN; MEUY CHANG SAETURN and  
BUON DUANGPRASAERT, both individually  
and as parents and guardians of A.D., a minor;  
GIFTY EGHAN; JOYCE MENSAH,  
individually and as parent and guardian of E.D.,  
a minor, JUSTIN ALEXANDER (as assignees  
of VIP International Real Estate Group, Inc.);  
and VIP International Real Estate Group, Inc., a  
Washington corporation,

Defendants.

Case No. 2:24-cv-00917

**STIPULATED MOTION AND  
~~PROPOSED~~ ORDER TO EXTEND  
DEADLINES**

**NOTE ON MOTION CALENDAR:**  
November 25, 2024

1 Plaintiff Continental Casualty Company (“Continental”), and Defendants Rosalinda  
 2 Herrera Heredia, A.R.H., Juan Reyes Tapia, Leslie Reyes-Herrera, Ana Herrera Heredia, E.H.,  
 3 Eduardo Hernandez Herrera, Sampson Kwaku Gyan, Georgina Twumwaa Gyan, MG., Amanda  
 4 Pomaa Gyan, Francis Kwadwo Gyan, Angelina Adoma Gyan, Meuy Chang Saeturn, Buon  
 5 Duangprasaert, A.D., Gifty Eghan, Joyce Mensah, E.D., and Justin Alexander (the “Individual  
 6 Defendants”) and Defendant VIP International Real Estate Group, Inc. (“VIP”), (collectively, the  
 7 “Parties”), stipulate and agree as follows and request that the Court enter an order consistent with  
 8 the following:

9 1. On October 3, 2024, the Court issued a Minute Order Setting Initial Case Management  
 10 Dates ordering the parties to conduct a Rule 26(f) conference no later than November 14, 2024,  
 11 exchange initial disclosures by November 21, and submit the Joint Status Report by November 29.  
 12 Dkt. No. 23.

13 2. All parties participated in a Rule 26(f) conference on November 7, 2024, and the parties  
 14 have continued to discuss various discovery issues and deadlines in this case and, in light of the  
 15 upcoming holiday, VIP’s pending motion to dismiss (Dkt. No. 29), and other matters, the parties  
 16 need additional time to discuss the issues to be included in the Joint Status Report. As such, the  
 17 parties request the initial disclosure and Joint Status Report deadlines be extended to December  
 18 13, 2024.

19 3. On November 21, 2024, consistent with Fed. R. Civ. P. 6(b)(1)(A) and prior to the deadline  
 20 for initial disclosures expiring, counsel for Plaintiff emailed the Court to informally request an  
 21 extension, but have not yet received a response.

22 4. Accordingly, the parties respectfully request that the Court, for good cause shown, extend  
 23 the initial disclosure and Joint Status Report deadlines to December 13, 2024.

Dated this 25th day of November, 2024

DLA PIPER LLP (US)

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Eghan, Joyce Mensah, E.D., and Justin  
Alexander*

**ORDER**

IT IS SO ORDERED.

Dated this 25th day of November, 2024.

A handwritten signature in black ink, reading "John C. Coughenour", written over a horizontal line.

HONORABLE JOHN C. COUGHENOUR  
United States District Judge

PRESENTED BY:

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 25, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorney of record for the parties.

Dated this 25th day of November, 2024.

*s/ Jacey Bittle*

Jacey Bittle, Legal Executive Assistant